

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
Plaintiff,)	
)	
vs.)	Civil Action No. 02CV-12490 REK
)	
ROBERT AND KATHLEEN HAAG)	
Defendants.)	
)	
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ROBERT HAAG, and)	
KATHLEEN HAAG,)	
)	
Plaintiffs,)	Civil Action No. 04CV-12344 REK
)	
vs.)	
)	
ROBERT MURPHY,)	
JOHN KEACH,)	
INTERNAL REVENUE SERVICE, AND)	
UNITED STATES OF AMERICA,)	
)	
Defendants.)	
)	
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ASSENTED-TO UNITED STATES' MOTION TO EXTEND TIME BY 21 DAYS
UP TO AND INCLUDING MARCH 16, 2005,
TO (1) ANSWER OR OTHERWISE RESPOND ON ITS BEHALF
AND (2) TO OBTAIN AUTHORIZATION TO RESPOND ON BEHALF OF
JOHN KEACH AND ROBERT MURPHY AND TO FILE ANY SUCH RESPONSE

The United States moves for an extension of 21 days up to and including March 16, 2005, to answer or otherwise respond to the complaint filed in Civil Action No. 04CV-12344 on its behalf, and to obtain authorization to respond on behalf of John Keach and Robert Murphy and to file any such response. As good cause for this motion, undersigned counsel states that he

needs additional time to obtain authorization to represent defendants John Keach and Robert Murphy on the allegations against them under *Bivens v. Six Unknown Named Agents of the Federal Bureau of Narcotics*, 403 U.S. 388 (1971), contained in Counts II and III of the complaint. This additional time is also necessary to gather the facts necessary to prepare a responsive pleading for the United States, Internal Revenue Service, and defendants Keach and Murphy (if they consent to such representation).

This is the first request for extension of time. This extension will not interfere with any impending court deadlines, including the April 5th conference with the Court.

On this date, undersigned counsel for the United States spoke with counsel for the plaintiffs, Timothy Burke, who consented to the extension of time.

MICHAEL J. SULLIVAN
United States Attorney

BARBARA HEALY SMITH
Assistant U.S. Attorney

/s/ Alejandro L. Bertoldo
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CERTIFICATE OF SERVICE

It is hereby certified that the attached *United States' Motion for Extension of 21 days up to and including March 16, 2005 to Answer or Otherwise Respond* was filed electronically this February 11, 2005, with service to be made by the electronic filing system on Timothy Burke, Esq.

/s/ Alejandro L. Bertoldo
ALEJANDRO L. BERTOLDO
Trial Attorney, Tax Division
U.S. Department of Justice